

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SUSAN WIGSMOEN,)	
)	Case No. 17-cv-7154
Plaintiff,)	
)	Judge Amy J. St. Eve
v.)	
)	
MANDARICH LAW GROUP, LLP)	
)	
Defendant.)	

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE FEE
PETITION AND FOR MODIFICATION OF JUDGMENT**

NOW COMES Plaintiff Susan Wigsmoen, by and through counsel, and respectfully requests that this Court grant Plaintiff an additional 14 days to file her fee motion, up through and including February 26, 2018 and to vacate the dismissal of this case and strike the March 16, 2018 dismissal date. In support thereof, Plaintiff states as follows:

1. On November 13, 2017, Plaintiff filed a Notice of Acceptance of Offer of Judgment, for \$1,001, plus attorney's fees and costs as agreed to by the parties, or if the parties could not agree, to be decided by the court on motion. (Dkt. #15).

2. On November 13, 2017, this court entered a minute order stating in part:

Plaintiff has accepted the offer of judgment in the amount of \$1,001.00 for plaintiff and reasonable attorneys' fees and costs incurred by Plaintiff. Judgment will be entered once the fee and costs are resolved. Parties are given leave to confer pursuant to Local Rule 54.3 on plaintiff's attorneys' fees and costs and are to file their joint statement by 2/12/18. This case is hereby dismissed without prejudice until 3/16/18 so that the fee issue may be resolved. All other pending dates and deadlines are stricken. Civil case terminated. Mailed notice(kef,) (Entered: 11/13/2017).

(Dkt. # 16).

3. The parties have conferred and are unable to agree on the attorneys' fees and costs. While the parties have filed their Joint Statement pursuant to LR. 54.3, Plaintiff

respectfully requests and extension of 14 days, up to and including February 19, 2018, to file a fee petition.

4. On February 12, 2018, Plaintiff's counsel corresponded with Defendant's counsel, Katherine Olson, regarding the proposed extension and Defendant's counsel has stated that there is no objection to this request.

5. This is Plaintiff's first request for an extension of time to file her fee petition.

6. The purpose of this extension is not for delay, and would prejudice neither party, but is rather to allow Plaintiff's counsel sufficient time to prepare Plaintiff's fee petition, pursuant to LR. 54.3.

7. Additionally, this court noted in its November 13, 2017 minute order that this case was dismissed without prejudice until March 16, 2018 so that the fee issue may be resolved. Plaintiff respectfully requests that this court vacate the dismissal of this case and strike the March 16, 2018 date, so that judgment may be entered in Plaintiff's favor on the Offer of Judgment, and the attorney's fees and costs in an amount decided by this court, when that issue is resolved.

WHEREFORE, based on the foregoing, Plaintiff, by and through counsel, respectfully requests that this Court grant Plaintiff until February 26, 2018 to file her Fee Petition, to vacate the dismissal of this case, and vacate the March 16, 2018 date set to dismiss this case with prejudice.

Respectfully Submitted,

By: /s/ Bryan Paul Thompson
One of Plaintiff's Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on Monday, February 12, 2018, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all registered participants.

Respectfully submitted

/s/ Bryan Paul Thompson
One of Plaintiff's Attorneys